

From: Joseph Gantos  
To: Santos, Carmen; Amyann, Steve  
Cc: Bob Douvan; Robert Cronin; Ron Fager; Keith Takata; Baswell, Kevin; Kennedy, Christina; Dettle  
Subject: Re: EPA Approval - Draft Condition for your review  
Date: Friday, April 22, 2016 12:36:08 PM

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Hi Carmen,

Here are a few changes for your consideration. Please let me know if you need anything else.

Have a good weekend,

Joe

**"Use of tanks for storage of water that contains PCBs.** EPA's extension of the time frame to store PCB remediation wastes at the LBNL waste accumulation area is also subject to the requirements of this condition. LBNL proposes to locate and use two above-ground 21,000 gallon tanks at its waste accumulation area for storage of liquid decontamination wastes and water from excavations that may contain PCBs. **LBNL is presently storing, in two holding tanks, accumulated storm water that contains PCBs at concentrations up to 0.624 micrograms per liter based on summation of 209 PCB congeners analyzed and will transfer this water to the 21,000 gallon tanks within 14 days of receipt of this Approval.** Before starting to use the 21,000-gallon tanks, LBNL must have in place a plan that details the equipment, workforce, procedures, and steps to prevent, control, and provide adequate protective measures to **mitigate** a release or discharge from any of the tanks during any situation, including catastrophic events (e.g., earthquakes). Please provide the plan described herein within 14 days after the date of this Approval.

The tanks must be inspected weekly and the inspections must demonstrate that leakage from the tanks is not occurring and the physical integrity of the tanks is not compromised. In addition, LBNL must abide by applicable requirements in 40 CFR 761.65(c)(6) **for PCB waste at concentrations greater than 50 ppm;** and the tanks must be properly marked consistent with 40 CFR 761.65(c)(8). **Storage of liquid wastes containing PCBs at concentrations greater than 50 ppm in tanks is not to exceed 90 days from the first date of waste generation. All liquid waste must be disposed of within 90 days of cleanup completion.**

On Thu, Apr 21, 2016 at 3:34 PM, Santos, Carmen <[Santos.Carmen@epa.gov](mailto:Santos.Carmen@epa.gov)> wrote:

Hello Joe:

I will meet with Steve very soon regarding your reply to my email.

I am making a few final changes to the Approval. Please review the Condition below; and please call me after you have a chance.

**"Use of tanks for storage of water that contains PCBs.** EPA's extension of the time frame to store PCB remediation wastes at the LBNL waste accumulation area is also subject to the requirements of this condition. LBNL proposes to locate and use two above-ground 21,000 gallon tanks at its waste accumulation area for storage of liquid decontamination wastes and water from excavations that may contain PCBs. Before starting to use the tanks, LBNL must have in place a plan that details the equipment, workforce, procedures, and steps to prevent, control, and provide adequate protective measures to a release or discharge from any of the tanks during any situation including catastrophic events (e.g., earthquakes). Please provide the plan described herein within 14 days after the date of this Approval.

The tanks must be inspected weekly and the inspections must demonstrate that leakage from the tanks is not occurring and the physical integrity of the tanks is not compromised. In addition, LBNL must abide by applicable requirements in 40 CFR 761.65(c)(6); and the tanks must be properly marked consistent with 40 CFR 761.65(c)(8). Storage of liquid wastes containing PCBs in tanks is not to exceed 90 days from the first date of waste generation."

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Sincerely,

Carmen

Carmen D. Santos

PCB Coordinator

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*"Think left and think right and think low and think high. Oh, the thinks you can think up if only you try!"* Dr. Seuss

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Before printing this message and/or attachments, think if it is necessary. Think Green.

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